

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOHN DOE, et al.,

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

CASE NO. C17-0178JLR

**STIPULATED MOTION TO RE-OPEN
CASES FOR LIMITED PURPOSE OF
FORMAL APPROVAL OF SETTLEMENT**

**NOTE ON MOTION CALENDAR: January
10, 2020**

JEWISH FAMILY SERVICE, et al.,

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

CASE NO. C17-1707JLR

(RELATING TO BOTH CASES)

STIPULATED MOTION TO RE-OPEN CASES
(No. 17-cv-0178-JLR)

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1 The Parties jointly file this motion to respectfully request that the Court re-open these cases
2 for the limited purpose of allowing an additional two weeks to finalize the settlement agreement
3 that will lead to a complete resolution of these cases. As discussed below, despite diligent efforts
4 in the past two months, counsel for the Parties require the additional time to finalize the settlement
5 agreement.

6 **A. The Parties' Progress in Reaching Settlement**

7 On November 13, 2019, the Court entered an Order of Dismissal (ECF No. 202) following
8 the Parties' Notice Regarding Status of Settlement Discussions (ECF No. 200) that explained the
9 Parties have reached agreement on the principles of a settlement. The Order noted that "[i]n the
10 event settlement is not perfected, any party may move to reopen the case, provided such motion is
11 filed within 60 days of the date of this order."

12 Since then, the Parties have worked diligently to draft appropriate documentation that
13 reflects their agreement, exchanging numerous drafts and conferring over the phone on several
14 occasions. However, the intervening holidays limited the availability of key stakeholders and it
15 took the Parties until this week to reach agreement on the near final written form of the settlement
16 agreement.

17 **B. The Need for Additional Time to Obtain Formal Approval**

18 At this stage, counsel for the Parties still need to obtain formal approval of the final written
19 form of the settlement agreement, which counsel expect may take some time given the varied
20 situations of the clients. For Plaintiffs, the formal approval process for certain organizational
21 plaintiffs requires convening their board for a vote. Moreover, Plaintiffs' counsel will need to
22 prepare translated versions of the agreement in Arabic and in Somali for some of the individual
23 clients. Some individual plaintiffs live in precarious situations where it may take time to safely
24 access telephone or e-mail. Defendants have obtained most of the necessary approvals and expect
25 that the remaining steps of the approval process will be complete in the coming days.

26 The Parties therefore respectfully request that the Court re-open the cases for the limited

1 purpose of providing necessary time to finalize and execute the settlement agreement. Although
2 the settlement is not yet perfected for the reasons given above, counsel for Plaintiffs expect to be
3 able to obtain formal approval of the settlement agreement within two weeks and are prepared to
4 file a stipulated dismissal as soon as they obtain formal approval.
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1 RESPECTFULLY SUBMITTED BY,

DATED this 10th day of January, 2020.

2 AMERICAN CIVIL LIBERTIES UNION
3 OF WASHINGTON FOUNDATION

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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2020, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all of the registered CM/ECF users for this case.

DATED: January 10, 2020

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CERTIFICATE OF SERVICE
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